UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JENNIFER S. FISCHMAN,

CIVIL ACTION NO.: 18-CV-08188

(JMF)

Plaintiff,

v.

MITSUBISHI CHEMICAL HOLDINGS AMERICA, INC. et al.

Defendants.

PLAINTIFF'S MOTIONS IN LIMINE FOR EXCLUSION OF THE REPORTS AND TESTIMONY OF CHAD STALLER, RONA WEXLER AND GERALD LaPORTE

Plaintiff Jennifer S. Fischman, by her undersigned attorneys, moves this Court pursuant to Federal Rule of Evidence 702 to exclude Defendants' expert reports and anticipated testimony from consideration in connection with this matter.

Plaintiff asks that the Court exclude the report and testimony of Chad Staller, Rona Wexler, and Gerald LaPorte as not meeting the standards set forth in Fed. R. Evid. 702.

Accompanying memoranda of law set out the factual and legal bases for the motions.

The Court authorized these motions via a proposed scheduling order endorsed, So-Ordered, and entered on the ECF Docket on September 1, 2022 as ECF Dkt No. 131.

Dated: Garden City, New York November 1, 2022

Respectfully Submitted,

By: /s/ *Matthew L. Berman*

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2022 a true and correct copy of Plaintiffs' Notice of

Motions in Limine to Exclude the Testimony of Chad Staller, Rona Wexler and Gerald LaPorte,

the accompanying memoranda of law, and the accompanying Declaration of Matthew L. Berman

were served via electronic email on all counsel of record.

Date: November 1, 2022

/s/ Matthew L. Berman

Matthew L. Berman, Esq.